

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

UNITED STATES OF AMERICA :  
 :  
v. : Criminal Action No.  
 : 3:21-CR-0004-TCB-RGV  
ROBERT PURBECK :

**DEFENDANT ROBERT PURBECK'S UNOPPOSED MOTION FOR EXTENSION  
OF THE TIME TO FILE PRETRIAL MOTIONS AND TO SCHEDULE  
PRETRIAL CONFERENCE**

Defendant Robert Purbeck hereby respectfully requests an extension of time in which to file any pretrial motions until June 7, 2021 and for the Court to hold the initial pretrial conference thereafter. This represents just over a 60-day extension of time from the current deadline of April 5, 2021; with the 60<sup>th</sup> day falling on Friday, June 4th, Mr. Purbeck is requesting through the end of Monday, June 7, 2021. He further requests and consents to the Court excluding the period of any extension that is granted from the Speedy Trial Act. The government does not oppose this requested extension.

In further support of this motion, Mr. Purbeck respectfully submits as follows.

1. Mr. Purbeck was arraigned in the Northern District of Georgia on March 22, 2021. Discovery is voluminous, with the government requesting a 1TB external hard drive, which

Mr. Purbeck provided on March 22<sup>nd</sup>. Mr. Purbeck anticipates receiving the initial discovery from the government in the coming days, with additional rounds of discovery being produced thereafter.

2. Mr. Purbeck lives in Idaho. Upon receiving discovery from the government, counsel and Mr. Purbeck will begin the process of reviewing the discovery to determine what motions and/or defenses may exist in this case, as well as determining how best to proceed in this case. There is a protective order in this case, which prevents counsel from giving certain portions of the discovery to Defendant. While counsel will provide to Mr. Purbeck copies of the discovery that he is allowed to share, the portions that must be reviewed together will require counsel to schedule sessions during which he and Mr. Purbeck can review discovery simultaneously using a screen-sharing medium. Once Mr. Purbeck receives the discovery, he will be in a better position to assess the volume and time required to review and analyze it properly.

3. At present, Mr. Purbeck is requesting through June 7, 2021 to file any pretrial motions and for the Court to

hold a pretrial conference. The government is agreeable with, and has no opposition to, Mr. Purbeck's requested extension.

4. Mr. Purbeck hereby consents to the exclusion under the Speedy Trial Act of the time that the Court grants for the requested extension. He further respectfully submits that such additional time is necessary for the effective preparation of his defense in this case.

WHEREFORE, for the reasons stated above, Defendant Robert Purbeck requests that the Court grant this motion and the requested extension of time.

Respectfully submitted, this 29<sup>th</sup> day of March, 2021.

/s/ Andrew C. Hall

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CERTIFICATE OF COMPLIANCE WITH TYPE AND FONT  
AND CERTIFICATE OF SERVICE

I hereby certify that this motion has been prepared in Courier New font (12 pt.) and consistent with the Local Rules of this Court.

I further hereby certify that I have this date caused a true and correct copy of the foregoing DEFENDANT ROBERT PURBECK'S UNOPPOSED MOTION FOR EXTENSION OF THE TIME TO FILE PRETRIAL MOTIONS AND TO SCHEDULE PRETRIAL CONFERENCE to be served by filing it with the Clerk of Court using the ECF System that will send notification of such filing to:

Assistant United States Attorney Michael Herskowitz and Nathan Kitchens

This the 29<sup>th</sup> day of March, 2021.

/s/ Andrew C. Hall  
Andrew C. Hall